

EXHIBIT A

STATE COURT DOCKET

https://research.txcourts.gov/CourtRecordsSearch/ViewCasePrint/a48b6971001d5d6498dafb4f9ae9acf3

Case Information

Elias Joseph Karam VS META PLATFORMS

2024CI04190

Location
Bexar County - 224th District Court

Case Category
Civil - Injury or Damage

Case Type
Defamation/Libel/Slander

Case Filed Date
2/26/2024

Judge
224th, District Court

Parties ²

Type	Name	Nickname/Alias	Attorneys
Plaintiff	Elias Joseph Karam		Pro Se
Defendant	META PLATFORMS		

Events ⁴

Date	Event	Type	Comments	Documents
2/26/2024	Filing	Petition		Lawsuit (version 3).pdf
4/5/2024	Filing	COPY OF	Property Value Under Exclusive Management of Elias Joseph Karam	Copy of market values & home values (UWM) of the properties(CAD) of document Generated properties - Google Sheets.pdf
4/5/2024	Filing	MOTION FOR DEFAULT JUDGMENT		FacebookLawsuitDefaultJudge.pdf
5/24/2024	Filing	REQUEST FOR SERVICE AND PROCESS		REQUEST FOR SERVICE.pdf



CERTIFIED MAIL 7020 1290 0002 1671 7441

Case Number: 2024CI04190

Elias Joseph Karam VS META PLATFORMS

(Note: Attached Document May Contain Additional Litigants.)

IN THE 224th District Court
BEXAR COUNTY, TEXAS

CITATION

"THE STATE OF TEXAS"

DIRECTED TO: META PLATFORMS

By Serving Its Registered Agent Corporation Service Company DBA CSC-Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, TX 78701-3218 USA

"You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00am on the Monday next following the expiration of twenty days after you were served this Citation and Petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org." Said **ORIGINAL PETITION** was filed on this the 26th day of February, 2024.

ISSUED UNDER MY HAND AND SEAL OF SAID COURT 31ST DAY OF MAY, 2024.

Elias Joseph Karam
PRO-SE
259 Rockhill Dr
San Antonio TX 78209



Gloria A. Martinez
Bexar County District Clerk
101 W. Nueva, Suite 217

San Antonio, Texas 78205
By: /s/ Patrick Gordon
Patrick Gordon, Deputy

Elias Joseph Karam VS META PLATFORMS

Officer's Return

Case Number: 2024CI04190
Court: 224th District Court

Came to hand on the 31st day of May, 2024, at 11:11 AM and EXECUTED (NOT EXECUTED) by CERTIFIED MAIL, on the _____ day of _____, 20_____, by delivering to: _____ at 211 E. 7th Street, Suite 620 Austin, TX 78701-3218 USA

Austin TX 78701 a true copy of this CITATION, upon which I endorsed that date of delivery, together with the accompanying copy of the CITATION with ORIGINAL PETITION.

Cause of failure to execute this is _____



Gloria A. Martinez
Bexar County District Clerk
101 W. Nueva, Suite 217
San Antonio, Texas 78205

By: /s/ Patrick Gordon
Patrick Gordon, Deputy

- C. Defamation
- D. Deceptive Trade Practices
- E. Fraud
- F. Violations of Fair Housing Laws
- G. Emotional and Psychological Damages

****V. DAMAGES****

As a direct and proximate result of Meta's actions, Plaintiff has suffered damages in excess of \$25,000,000, including but not limited to lost revenue, damage to professional reputation, emotional distress, and psychological harm. The conduct of Meta, as detailed herein, was willful, malicious, and demonstrated a reckless disregard for the rights and well-being of the Plaintiff, justifying an award of punitive damages.

****VI. PRAYER FOR RELIEF****

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Award compensatory damages in the amount of \$25,000,000 or as determined by the Court for lost revenue, damage to professional reputation, emotional distress, and psychological harm;
- B. Award punitive damages in an amount sufficient to punish the Defendant for their willful and malicious conduct and to deter such conduct in the future;
- C. Grant injunctive relief prohibiting Meta from continuing its unlawful practices;
- D. Award costs of this action including attorney's fees; and
- E. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Elias Joseph Karam

Elias Joseph Karam

dotloop verified
02/24/24 4:44 AM CST
EBEP-N2BN-SJX2-GIPO

210-828-5187
louiekaram@gmail.com
259 Rockhill Dr, San Antonio, Texas, 78209
Elias Joseph Karam

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Envelope ID: 84868661
Filing Code Description: Petition
Filing Description:
Status as of 2/26/2024 8:43 AM CST

Associated Case Party: EliasJosephKaram

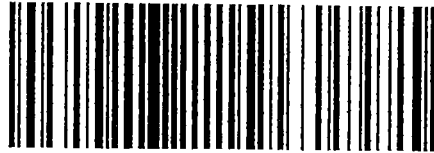
Name	BarNumber	Email	TimestampSubmitted	Status
Elias Karam		louiekaram@gmail.com	2/24/2024 4:51:42 AM	SENT

Associated Case Party: META PLATFORMS

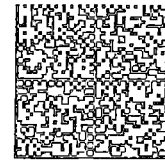
Name	BarNumber	Email	TimestampSubmitted	Status
Meta Platforms INC.		legal@facebook.com	2/24/2024 4:51:42 AM	SENT

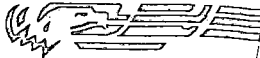


Gloria A. Martinez
Bexar County District Clerk
101 W. Nueva, Suite 217
San Antonio, Texas 78205
RETURN SERVICE REQUESTED



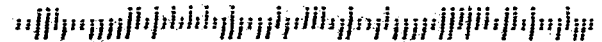
7020 1290 0002 1671 7441



US POSTAGE PAID PITNEY BOWERS

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Meta Platforms
By Serving Its Registered Agent Corporation Service Company
DBA CSC-Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, TX 78701-3218 USA
Patrick Gordon Citation Certified Mail 2024CI04190

787013218 0015



Sabor Properties				NTREIS Properties				Austin Rental Properties			
Property Address		Property ID	Estimated Value (on UWM)	Property Address		Property ID	Estimated Value (on UWM)	Property Address		Property ID	Estimated Value (on UWM)
			Sale				Sale				Sale
			Rental				Rental				Rental
435 Vanderbilt St, San Antonio, TX 78210, USA		384166	\$256,775.00	915 Western Ave, Borger, TX 79007		3531		2110 ARPDAL ST		100700	\$1,118,258.00
7830 Bent Branch, San Antonio, TX 78250, USA		703309	\$359,946.00	905 E 16th St, Big Spring, TX 79720 (Rear)		279200		1803 HOLLY ST		188274	\$620,534.00
1711 Ceralvo St, San Antonio, TX 78237, USA		421545	\$243,794.00	810 N Madden St, Shamrock, TX 79079		2107	No residential home value exists for this address	1708 Montopolis Dr, Austin, TX 78741, USA		289328	No residential home value exists for this address
2223 Muddy Peak Dr, San Antonio, TX 78245, USA		340504	\$207,002.00	808 Bowie St, Sweetwater, TX 79556		31705	\$29,564.00	LANGHAM ST or 1710 Montopolis Dr, Austin, TX 78741, USA		289329	No residential home value exists for this address
214 Weaver St, San Antonio, TX 78210		378518	\$289,247.00	804 Moody St, Borger, TX 79007		14583	No residential home value exists for this address	6110 KASPER ST		289332	\$296,223.00
259 Rockhill Dr, San Antonio, TX 78209, US		516439	\$1,006,714.00	804 Avenue C, Levelland, TX 79336		6443	\$57,544.00	6108 KASPER ST		289333	\$297,355.00
1015 King Ave, San Antonio, TX 78211		426013	\$226,132.00	802 E 6TH ROTAN TX			\$74,558.00	6106 KASPER ST		289334	\$308,380.00
8411 Timber Fair, San Antonio, TX 78250, USA		715662	\$367,861.00	708 N Main St, Electra, TX 76360		111902	\$75,259.00	6104 KASPER ST		289335	not found
2220 40th St, Lubbock, TX 79412, USA		R74499	\$121,904.00	707 N Texas St, Shamrock, TX 79079		2131	No residential home value exists for this address	6102 KASPER ST		289337	not found
1144 W Mulberry Ave, San Antonio, TX 78201, USA		120880	\$324,878.00	613 S 10th Ave, Teague, TX 75860, USA		22657	\$72,829.00	6100 KASPER ST		289338	\$293,410.00
1803 Holly St, Austin, TX 78702, USA		188274	\$620,534.00	518 N Wilbarger St, Electra, TX 76360		111600	\$25,673.00	2400 FOREST AVE		305499	\$645,241.00
943 Essex St, San Antonio, TX 78210, USA		118463	\$261,936.00	512 N Alice Ave, Monahans, TX 79756, USA		7596	No residential home value exists for this address				
2474 Abbott Rd, St Hedwig, TX 78152, USA			\$650000	509 Franklin Ave, Spur, TX 79370, USA		5366	No residential home value exists for this address				
1439 Schley Ave, San Antonio, TX 78210, USA		380777	\$270,885.00	508 W Live Oak St, Jacksboro, TX 76458		5250	\$57,855.00				
4842 John Victor Dr, San Antonio, TX 78220, USA		514619	\$54,242.00	503 Story St, Coleman, TX 76834		R17814	\$25,562.00				
6100 Kasper St, Austin, TX 78741, USA		289338	\$293,410.00	44 Northwest Avenue A, Hamlin, TX 79520 / 44 NW AVE A		11590	\$44,324.00				
6001 Goliad Ave, Dallas, TX 75206, USA		184345000000	\$585,269.00	417 Alabama St, Borger, TX 79007		12380	No residential home value exists for this address				
9426 Arcadia Creek, San Antonio, TX 78251, USA		665822	\$353,526.00	408 N 3rd St E, Haskell, TX 79521		6771	\$87,800.00				
6110 Kasper St, Austin, TX 78741, USA		289332	\$296,223.00	406 Giles St, Mineola, TX 75773		38774	\$70,234.00				
6102 Kasper St, Austin, TX 78741, USA		289337	not found	317 S Waggoner St, Electra, TX 76360		112271	No residential home value exists for this address				
700 LENA DR Del Rio TX 78840		24264	\$56,726.00	2268 E 48TH ST, LUBBOCK, TX 79404		R27638	\$53,594.00				
3635 Candlehill, San Antonio, TX 78244, USA		326840	\$346,708.00	213 Burlington Ave, Spur, TX 79370, USA		4657	No residential home value exists for this address				
9410 Grace Pt, San Antonio, TX 78250, USA		727373	\$359,666.00	211 S Texas St, Shamrock, TX 79079		3252	No residential home value exists for this address				
2400 Forest Ave, Austin, TX 78704, USA		305499	\$645,241.00	207 Avenue L, Levelland, TX 79336		13543	\$51,574.00				
818 Austin St, Asherton, TX 78827, USA		111010	\$109,519.00	2019 W POPLAR ST, SAN ANTONIO, TX 78207		126082	\$98,474.00				
9719 Alexa Pl, San Antonio, TX 78251, USA		665930	\$342,229.00	194 Fernando St, Mercedes, TX 78570, USA		220813	\$50,556.00				
9823 Logans Ridge Dr, Converse, TX 78109, USA		305949	\$352,193.00	1915 Lamar St, Vernon, TX 76384		4705001	\$33,175.00				
3306 W Poplar St, San Antonio, TX 78228		148560	\$232,079.00	175 N Austin Ave, Littlefield, TX 79339		19187	\$35,146.00				
1046 Poinsettia St, San Antonio, TX 78202, USA		441284	\$206,960.00	148 Morning Dove Dr, Jefferson, TX 75657			\$83,427.00				
301 Chapa Ave, San Diego, TX 78384, USA			\$79000	138 W Lake Dr, Hamlin, TX 79520, USA		16764	\$71,901.00				
250 W Boyer Ave, San Antonio, TX 78210, USA		383750	\$255,456.00	1325 Potter St, Borger, TX 79007		4913	No residential home value exists for this address				
1718 Schley Ave, San Antonio, TX 78210, USA		380876	\$292,908.00	1300 Francis St, Borger, TX 79007		4693	No residential home value exists for this address				
8507 Watchtower St, San Antonio, TX 78254, USA		682336	\$369,709.00	117 N Crosby St, Crosbyton, TX 79322		10048	No residential home value exists for this address				
6106 Kasper St, Austin, TX 78741, USA		289334	\$308,380.00	114 S Farmer St, Crosbyton, TX 79322		10068	\$93,580.00				
215 Avondale Ave, San Antonio, TX 78223, USA		396858	\$143,395.00	1101 W Mesquite St, Coleman, TX 76834		R17043	\$71,518.00				
6108 Kasper St, Austin, TX 78741, USA		289333	\$297,355.00	106 E Magnolia Ave, Electra, TX 76360		111033	\$24,726.00				
9315 Rue De Bois, San Antonio, TX 78254, USA		694631	\$351,408.00	105 Tom Green St, Sweetwater, TX 79556, USA		26318	\$89,383.00				
2623 Country Hollow, San Antonio, TX 78209, USA		617301	\$820,978.00	104 S IOWA, SHAMROCK, TX 79079		2364	No residential home value exists for this address				
307 McKinley Ave, San Antonio, TX 78210, USA		138499	\$284,735.00	104 Co Rd 3784, Queen City, TX 75572, USA		42019	\$39,622.00				
2110 Arpdale St, Austin, TX 78704, USA		100700	\$1,118,258.00	1023 Hirschi Ln, Wichita Falls, TX 76306		140042	No residential home value exists for this address				
6104 Kasper St, Austin, TX 78741, USA		289335	\$250000	101 Avenue C, Electra, TX 76360		110916	\$78,033.00				
1105 Rivas St, San Antonio, TX 78207		126504	\$135,690.00	133 Elms Ave, Littlefield, TX 79339			No residential home value exists for this address				
1113 Rivas St, San Antonio, TX 78207, USA		126501	\$213,824.00								
343 Ranmar Ave, San Antonio, TX 78214, USA		506289	\$250,623.00								
551 E Southcross, San Antonio, TX 78214, USA		399232	\$255,988.00								
111 Austin St, San Antonio, TX, 78215 USA			\$105,000.00								
10942 Beinhorn, Houston, Texas			\$1800000								
624 E El Prado, San Antonio, Texas			\$1910000								
2400 Forest Avenue, Austin, Texas			Repeat								
1803 Holly Avenue, Austin Texas			Repeat								
11815 Meadowspring, Dallas Texas			\$650000								

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Automated Certificate of eService

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Envelope ID: 86326711

Filing Code Description: MOTION FOR DEFAULT JUDGMENT

Filing Description:

Status as of 4/8/2024 4:26 PM CST

Associated Case Party: META PLATFORMS

Name	BarNumber	Email	TimestampSubmitted	Status
Meta Platforms INC.		legal@facebook.com	4/5/2024 5:26:52 AM	SENT

Associated Case Party: EliasJosephKaram

Name	BarNumber	Email	TimestampSubmitted	Status
Elias Karam		louiekaram@gmail.com	4/5/2024 5:26:52 AM	SENT

IN THE DISTRICT COURT OF BEXAR COUNTY, TEXAS

Elias Joseph Karam
Plaintiff,
v.
Meta Platforms,
Defendant.

Case No.: Case # 2024CI04190 - Judge 224th, District Court

MOTION FOR DEFAULT JUDGMENT

COMES NOW, Plaintiff Elias Joseph Karam, by and through his undersigned counsel, and respectfully moves this Court for the entry of a Default Judgment against Defendant Meta Platforms, and in support thereof, states as follows:

Introduction: The Plaintiff, Elias Joseph Karam, filed his Petition for Damages against the Defendant, Meta Platforms, alleging various causes of action including shadow banning, advertisement misrepresentation, defamation, deceptive trade practices, fraud, violations of fair housing laws, and emotional and psychological damages.

Service of Process: The Defendant was duly served with the Summons and Petition for Damages, at its principal place of business located at 211 E. 7th Street Suite 620, Austin, TX 78701-3218, USA. Proof of service was filed with this Court.

Default of Defendant: The Defendant, Meta Platforms, has failed to answer or otherwise respond to the Plaintiff's Petition within the time frame prescribed by law, and is therefore in default.

Request for Default Judgment: Pursuant to Texas Law, the Plaintiff now requests this Court to enter a default judgment against the Defendant, Meta Platforms, for failing to plead or otherwise defend against the action brought by the Plaintiff.

Damages Sought: The Plaintiff seeks compensatory damages in the amount of \$25,000,000 for lost revenue, damage to professional reputation, emotional distress, and psychological harm, along with punitive damages, costs of this action, including attorney's fees, and any other relief the Court deems just and proper.

WHEREFORE, Plaintiff Elias Joseph Karam respectfully requests that this Court enter a Default Judgment against Defendant Meta Platforms, and award damages, costs, and any other relief deemed just and proper.

Respectfully submitted,

Elias Joseph Karam
Pro Se

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Name	BarNumber	Email	TimestampSubmitted	Status
Elias Karam		louiekaram@gmail.com	4/5/2024 5:26:52 AM	SENT

Associated Case Party: META PLATFORMS

Name	BarNumber	Email	TimestampSubmitted	Status
Meta Platforms INC.		legal@facebook.com	4/5/2024 5:26:52 AM	SENT



CIT CML / SAC 4

GLORIA A. MARTINEZ
Bexar County District Clerk

REQUEST FOR PROCESS

Style: ELIAS JOSEPH KARAM Vs. META PLATFORMS

Request the following process: (Please check all that Apply)

☒ Citation ☐ Notice ☐ Temporary Restraining Order ☐ Notice of Application for Protective Order
☐ Temporary Protective Order ☐ Precept with hearing ☐ Precept without a hearing ☐ Writ of Attachment
☐ Writ of Habeas Corpus ☐ Writ of Garnishment ☐ Writ of Sequestration ☐ Capias ☐ Other: _____

1.

Name: META PLATFORMS

Registered Agent/By Serving: CORPORATION SERVICE COMPANY DBA CSC-LAWYERS INCORPORATING SERVICE COMPANY

Address 211 E. 7TH STREET, SUITE 620, AUSTIN, TEXAS 78701-3218

Service Type: (Check One) ☐ Private Process ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door ☒ Certified Mail
☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable 1 ☐ Constable 2 ☐ Constable 3 ☐ Constable 4

2.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door ☐ Certified Mail
☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable 1 ☐ Constable 2 ☐ Constable 3 ☐ Constable 4

3.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door ☐ Certified Mail
☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable 1 ☐ Constable 2 ☐ Constable 3 ☐ Constable 4

4.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door ☐ Certified Mail
☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable 1 ☐ Constable 2 ☐ Constable 3 ☐ Constable 4

Title of Document/Pleading to be Attached to Process: PETITION

Name of Attorney/Pro se: ELIAS J. KARAM PRO SE

Bar Number: N/A

Address: 259 ROCKHILL DR
SAN ANTONIO, TEXAS 78209

Phone Number: 210-828-5187

Attorney for Plaintiff ☒ Defendant ☐ Other ☐

****IF SERVICE IS NOT PICKED UP WITHIN 14 BUSINESS DAYS, SERVICE WILL BE DESTROYED****

Automated Certificate of eService

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Envelope ID: 88111661

Filing Code Description: REQUEST FOR SERVICE AND PROCESS

Filing Description:

Status as of 5/29/2024 9:07 AM CST

Associated Case Party: EliasJosephKaram

Name	BarNumber	Email	TimestampSubmitted	Status
Elias Karam		louiekaram@gmail.com	5/24/2024 11:52:32 AM	SENT

Associated Case Party: META PLATFORMS

Name	BarNumber	Email	TimestampSubmitted	Status
Meta Platforms INC.		legal@facebook.com	5/24/2024 11:52:32 AM	SENT